Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Parts 2 and 97 of the	)	
Commission's Rules to Create a Low Frequency	)	ET Docket No. 02-98
Allocation for the Amateur Radio Service	)	RM-9404
	)	
Amendment of Parts 2 and 97 of the	)	
Commission's Rules Regarding an Allocation of a	)	RM-10209
Band Near 5 MHz for the Amateur Radio Service	)	
	)	
Amendment of Parts 2 and 97 of the	)	
Commission's Rules Concerning the Use	)	RM-9949
Of the 2400-2402 MHz Band by the	)	
Amateur and Amateur-Satellite Services	)	

To: The Commission

COMMENTS OF THE QUARTER CENTURY WIRELESS ASSOCIATION

Introduction

The Quarter Century Wireless Association, Inc. ("QCWA"), strongly supports the adoption of the well-reasoned proposals put forth in the Notice of Proposed Rule Making ("Notice") adopted by the Commission on May 2, 2002. In particular, the allocation of HF spectrum in the 5250-5400 kHz band ("60 meter band") to the amateur service will significantly enhance the capability of the amateur service community in the United States to provide essential communication needs and facilitate relief actions when normal communication systems are overloaded, damaged or disrupted because a disaster has occurred.

Interests of petitioner

The QCWA is committed to promoting interest in the amateur service, the advancement of the electronic art, making use of the reservoir of knowledge and experience among the nearly

10,000 members of the QCWA for the benefit of all amateur operators and the furtherance of the public welfare through amateur service communications. As the organization whose purpose is to promote cooperation and friendship among amateur operators of at least 25 years service, the QCWA membership is comprised of persons who have been amateur operators for many decades. Our combined service in operating amateur stations properly probably exceeds some 300 millennia.

Response to call for specific comments

In the Notice, the Commission requests comments on its proposal for a secondary allocation in the 60 meter band to the amateur service. The QCWA respectfully provides its responses to the Commission's questions in the following paragraphs.

At ¶38, the Commission requests comment on its proposal to establish a secondary allocation for the amateur service in the 60 meter band. The QCWA strongly agrees with the Commission, for the good and valid reasons given in the Notice, the amateur service would benefit from such an allocation. We agree completely with the American Radio Relay League's contention that the 5000 kHz frequency band can be effective in supporting communication when the 3500 kHz and 7000 kHz bands are not. In particular, the QCWA looks toward having available the 60 meter band for intercommunications with amateur stations located within the hurricane-prone Caribbean Insular area during times of distress.

Additionally, the QCWA believes that there is a somewhat similar situation where the Commission regulates the amateur service in ITU Region 3. American Samoa, the Commonwealth of Northern Mariana Islands, Guam Island and other United States territories in ITU Region 3 would similarly benefit by having the 60 meter band availability for

intercommunications between those typhoon-prone areas as well as with the State of Hawaii during times when other communications are disrupted.

The QCWA recommends, therefore, the Commission authorize amateur stations to transmit from appropriate locations throughout all three ITU Regions. This would enable our amateur stations to provide emergency communications from aircraft and ships on or over any area of the world, except for those where another government or agency regulates the amateur service.

At ¶39, the Commission invites comments as to whether the 5250-5400 kHz band should be restricted to Amateur Extra Class operators to better ensure compatible sharing with the Federal Government operations, or could the band also be made also available to General or Advanced Class operators. The QCWA strongly recommends that the 60 meter band be authorized to General, Advanced and Amateur Extra Class operators. This is essential to taking the best possible advantage of the randomly distributed locations of amateur stations in providing emergency communications. Being situated at practically every point throughout the world, it often falls to the amateur operators on the scene to make known the situation and call for emergency assistance when disaster strikes unexpectedly such that normal communications are disrupted. The traditional dependency upon amateur operator self-reliance and the unstructured nature of the amateur service sometimes make it the only communication system able to function immediately in the wake of a major disaster. The 60 meter band should be made available, therefore, to all General, Advanced and Amateur Extra Class operators. These operators are fully qualified to operate properly amateur stations in the 60 meter band and have the skill and knowledge necessary to taking full advantage of the long- and short-range propagation characteristics of the 60 meter band.

Also, at ¶39, the Commission invites comment on whether the 1.5kW PEP power limit and operator license limitations are sufficient to prevent interference to primary users, and whether an EIRP limit would also be appropriate for this frequency band. Members of the QCWA throughout the United States have, since the adoption of the subject NPRM, monitored the 5250-5400 frequency band to determine the nature of the on-going communications engaged in by the primary users so as to be responsive to the Commission's concerns. They have found the band to be lightly occupied with signals similar to those typically used by amateur stations: RTTY, Data and Phone. Assuming that these are indeed the legitimately authorized transmissions by Government Fixed facilities that would have to be protected, it is obvious that sharing of the band will be highly effective. Based upon the long-time successes the numerous sharing arrangements for other frequency bands codified in §97.303, 47 CFR §97.303, adequate protection from transmissions by amateur stations will not be at all difficult. These arrangements have well served the existing primary users and have instilled the amateur service community with the know-how that has earned it the reputation as being a cooperative and non-obtrusive sharing user. The QCWA sees no reason to curtail either the numbers of operators or the maximum power of their stations.

Unlike practically any other type of radio station, an amateur HF station is specifically and carefully designed to enable the control operator to avoid causing interference to other stations. Technology is employed that facilitates highly efficient instant spectrum management. For example, frequency and power changes are made with but the tap of a button or the flick of a knob. Achieving favorable directed radiation is a widely active pursuit. Another useful receiver innovation is automatic band scanning and swept-spectrum usage visual presentations that show the operator on-going activity throughout an entire band. Still another precaution that has been

effective is the publication in advance of the specific channels and times where those stations that must receive protection intend to operate. There is a host of amateur service publications and websites that would offer to disseminate such information.

QCWA recommends against adopting an EIRP limit for amateur stations. EIRP is, at best, but a calculated estimate of the energy radiated by a station based upon a host of assumptions. It is all but useless in predicting the interference potential to some unknown distant receptor. It would be completely out of place among the very practical, and enforceable, technical standards that are now in specified in §§97.301 though 97.317, 47 CFR §§97.301-97.317. Note that the actual power limit, as stated in §97.313(a), 47 CFR §97.313(a), is that an amateur station must use the minimum transmitter power necessary to carry out the desired communications. This is a very realistic and effective way to specify maximum transmitter power for all amateur service bands.

Further, at ¶39, the Commission invites comments on other means that will reduce potential interference, such as the operational protocol of "listen before transmit" employed by amateur radio operators. In particular, the Commission requests comment on whether this protocol should be explicitly stated in the Rules in order to protect the primary operators. In response, the QCWA can most assuredly report that the amateur service community's nearly century-long protocol of "listen-before-transmit" instant spectrum management protocol is alive and well and needs no codification into the Commission's rules. It is well covered by the general standards for station operation in §97.101, 47 CFR §97.101. Furthermore, this basic operational principle is well known to every amateur operator and is a highlight of the qualifying examination every person must pass in order to obtain an amateur operator license grant from the FCC. For the Commission to introduce such a traditional protocol into the amateur service rules

could set the table for still other how-to provisions being added until the very flexible self-regulating nature of the amateur service is compromised. The QCWA, therefore, recommends against adopting any requirements of this type.

At ¶40, the Commission requests comments on whether it is necessary and or appropriate to segregate digital emission modes in the 60 meter band from other emission modes similar to that provided in the 40, 75 and 80 meter bands by §97.305(c), 47 CFR §97.305(c). The QCWA favors allowing the amateur service community to determine, as changing interests and conditions warrant, how best to segregate emission modes. In any event, please be informed that the QCWA has a policy with regard to emission type CW, the most basic form of radio communications. The QCWA supports authorization of International Morse telegraphy coded on-off CW transmissions on all frequencies on all amateur radio service frequency bands.

Summary

The QCWA strongly supports the adoption of the proposals put forth in the subject Notice. In particular, the allocation of HF spectrum in the 60 meter band to the amateur service will significantly enhance the capability of the amateur service community in the United States to provide essential communication needs and facilitate relief actions when normal communication systems are overloaded, damaged or disrupted because a disaster has occurred. The QCWA, therefore, recommends prompt adoption of the rules as proposed with the revisions suggested above.

Respectfully submitted for the Board of Directors,

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